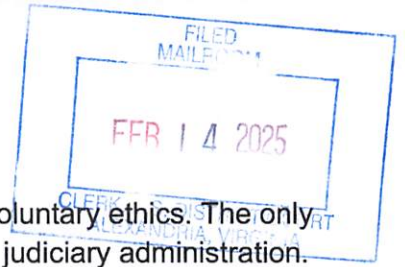


**Proposed Amended Complaint For Changing Defendant to United States District Court
Eastern District of Virginia**

Case no. 1:24-cv-00880



A judge is bound by the United States Constitution. This is more than voluntary ethics. The only thing that's 'voluntary' about ethics is the internal enforcement from the judiciary administration. As a matter of law, the people's right to freedom from bias or the appearance of bias is enshrined in the United States constitution. Whether a party has a lawyer or not, the Court must respect the people's right to be heard without bias and/or appearance of bias. Judges are shielded from personal liability but the political entity of the judiciary is not immune. There is precedent for district courts as Defendant's. I am seeking redress for the judicial violation of failing to provide a court free from bias and the appearance of bias.

I filed a lawsuit for disability discrimination against an employer in October of 2022 and that docket is the subject of this case. The following actions violated my right to procedural due process. I have a 14th amendment right to an impartial decision maker.

In this federal district court, the Eastern District of Virginia, a case has a Magistrate Judge and an Article III Judge. Both have teams of legal people. Any filing by the Article III team at least passes through the Magistrate team. Although the two Judges and their teams have different roles and responsibilities, if everything is in working order, the two teams work together.

1. On March 4, 2024, the Honorable United States Magistrate Judge, Judge John F. Anderson was removed from the case of 1:22:cv:01153 and replaced with the Honorable United States Magistrate Judge William B. Porter. No explanation was provided for this change. **The unexplained judge swap happened whilst a motion to amend was pending.** Why swap out judges at such a critical juncture, without so much as an explanation? **Where the new judge, the Honorable Magistrate Judge Porter, is the author of a rule that was being debated in the memorandums pending, and the original judge had no such connection in authorship.** Even if this is a coincidence, there is an appearance of bias in favor of the Defendant.
2. After 7 months of pending status, on May 15, 2024, the Honorable Judge William B. Porter granted the amendment and entered a terminated status for the case in the PACER database. Instead of ordering the Defendant to respond, I was ordered to refile the exact same document, for a second time. This **gave a 'heads up' to the Defendant party, giving the Defendant extra time to prepare a response without having to formally request anything from the Court. The Defendant had notice of the amendment already for 7 months because it was already on the docket. When an amendment is granted, it is the Defendant's turn to respond. Instead, I was expected to refile the exact same document and absorb the additional time and cost associated-** an undue burden against me and bias in favor of the Defendant

3. After I raised the concerns and implications about asking me to refile an amendment that was already filed, by filing the amendment on a new docket, the Court silently and without explanation, removed the status of terminated from 1:22:cv:01153. **Docket 1:22:cv:01153 had a status of terminated for many months before this silent and unexplained change. The removal of the terminated status was done after I entered several filings referencing the terminated status. The silent and unexplained change shows bias against me and my right to be heard because it was done after I entered several filings mentioning the terminated status. It shows a willingness to operate 'under the table' giving me disadvantage.** For example, the clerk has a mechanism to use such as Notice of Correction or Notice of Change to document everything but no such mechanism was used for the removal of the terminated status.
4. I requested the 1:22:cv:01153 Court to take disciplinary action against the Defendants attorneys for the Defendant. Although I raised several concerns, one of the concerns was simple: the Defendant's attorneys cited material facts of a case incorrectly, drawing not only a needlessly cruel comparison, but the attorneys invented facts that weren't actually in the case. Specifically, where the attorneys wrote that 'just how the Rohan's former colleagues didn't believe that she'd been sexually abused as a child, my former colleagues don't believe that I have any issues using vocal speech'. This alleged fact, that Rohan's colleagues didn't believe she was sexually abused as a child- it's not actually in the Rohan case and is a material misrepresentation. **In addition to sexualizing the situation of my case, adding facts to previous cases, facts that aren't actually in the case- it's a serious foul. However, a judge's silent permission of such unprofessionalism is about x100 worse and shows judicial bias in favor of the Defendant and/or against me.**
5. I respectfully asked the Honorable Magistrate Judge Porter to recuse himself. I'm not filing this as a reconsideration or appeal for his decision, the way the refusal was issued shows an appearance of or actual bias against me and/or in favor of the Defendant. I am not seeking him to be removed from the case, and I will not be filing any reconsideration or appeal to his decision. This is about the constitutional problems of the Honorable Judge's refusal. The response was issued 2 or 3 days after I filed the request and did not completely address my concerns. Mind you, my sur-reply requests have been pending for a very long time, effectively adding more and more age to my case while silencing me. I know things can move slow in Courts and you are all very busy, but the 1:22:cv:01153 docket has shown a complete disregard for my interests as it relates to time and money, a willingness to unnecessarily draw things out, helping the Defendant, whether it's intentional or not, but will issue orders very quickly on things like denying recusal, denying discipline- he shouldn't of been assigned and he should have seen the potential for bias or appearance of bias as the author of the far-removed-from-everyday-people rule of the check box. The orders from Judge Porter show a willingness say say hey we lean towards granting parties to submit filings on the policy of deciding cases on the merits yet leaving my requests to be fully heard undecided for 6+ months at a time.

Damages

This process has been excessively demoralizing and has caused undue extreme emotional distress. I am seeking 2 million dollars in damages.

CERTIFICATES & WAIVER

A. Truthfulness

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and Plaintiff served Defendant with a copy of this document on the same day.

B. Ghost Writing

I certify under penalty of perjury under the laws of the United States of America, pursuant to Local Rule 83.1(M), no attorney has prepared, or assisted me in the preparation of this document.

C. WAIVER

Plaintiff waives oral argument.

Date: February 10, 2025

Very Respectfully,

Printed Name: Danielle Taylor

Signed Name: 